

Small Business Administration

Privacy Impact Assessment

For

Electronic Lending

August 2005

Privacy Impact Assessment Authorization Memorandum

I have carefully assessed the Privacy Impact Assessment for the Electronic Lending System. This document has been completed in accordance with the requirements of the E-Government Act of 2002.

MANAGEMENT CERTIFICATION – Please check the appropriate statement.

_____ The document is accepted.

_____ The document is accepted pending the changes noted.

_____ The document is not accepted.

We fully accept the changes as needed improvements and authorize initiation of work to proceed. Based on our authority and judgment, the continued operation of this system is authorized.

System Manager

DATE

OCIO/Project Representative

DATE

Program/Office Head

DATE

OCIO

DATE

Chief FOI/PA

DATE

Senior Official for Privacy

DATE

Name of Project: Electronic Lending
Program Office: Office of Financial Assistance
Project's Unique ID:

A. CONTACT INFORMATION:

1. Who is the person completing this document?

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2. Who is the system owner?

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3. Who is the system manager for this system or application?

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4. Who is the IT Security Manager who reviewed this document?

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5. Did the Chief FOI/PA review this document? Yes.

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6. Did the Agency's Senior Office for Privacy review this document? Yes.

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7. Who is the Reviewing Official?

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B. SYSTEM APPLICATION/GENERAL INFORMATION:

1. Does this system contain any information about individuals?

Yes

(a) Is this information identifiable to the individual?

Yes

(b) Is the information about individual members of the public?

Yes

(c) Is the information about employees?

No

2. What is the purpose of the system/application?

The Electronic Lending System enables lending partners to submit a loan guaranty application to SBA in an electronic format, speeding up processing time, eliminating the significant cost of mailing paper applications, and further enabling the Agency's compliance with GPEA.

3. What legal authority authorizes the purchase or development of this system/application?

GPEA, 15 U.S.C. §636(a) et seq. and 15 U.S.C. §695 to 697f.

C. DATA in the SYSTEM:

1. Generally describe the type of information to be used in the system and what categories of individuals are covered in the system?

Borrowers, Principals of Borrowers, Guarantors of Borrowers, Financial, address, personal identifier (SSN) and demographic

Lending Partner, demographics

2. What are the sources of the information in the system?

(a) Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

Lending Partners, SBAREF, Loan, LoanAcct, LoanApp

(b) What Federal agencies are providing data for use in the system?

None

(c) What State and local agencies are providing data for use in the system?

None

(d) From what other third party sources will data be collected?

Credit Reporting Agencies

(e) What information will be collected from the employee and the public?

Financial information, addresses, name and SSNs.

3. Accuracy, Timeliness, and Reliability

(a) How will data collected from sources other than SBA records be verified for accuracy?

Credit Reporting Agencies provide only outside data, they are the original source.

(b) How will data be checked for completeness?

Original Source

(c) Is the data current?

Data is current according to Credit Reporting Agencies' records

(d) Are the data elements described in detail and documented?

ELend IRWIN data models

D. ATTRIBUTES OF THE DATA:

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

Yes, data is used to verify SBA program compliance and record specifics of the loan being guaranteed

2. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?

No

- 3. Will the new data be placed in the individual's record?**

No

- 4. Can the system make determinations about employees/public that would not be possible without the new data?**

No

- 5. How will the new data be verified for relevance and accuracy?**

N/A

- 6. If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?**

ELend System Security Roles – Agency Security Access Procedures – Access is limited to those individuals with user IDs and passwords

- 7. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?**

ELend System Security Roles – Agency Security Access Procedures – Access is limited to those individuals with user IDs and passwords

- 8. How will the data be retrieved?**

Data cannot be retrieved by personal identifier, it can be business name, sole proprietor name or Employer Tax ID number.

- 9. What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

None

- 10. What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses and how individuals can grant consent.)?**

N/A – Lending partner submits the information

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

- 1. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

Only one site

2. What are the retention periods of data in this system?

As delineated in SBA's Privacy Act System of Records, SBA 21

3. What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?

As delineated in SBA's Privacy Act System of Records, SBA 21

4. Is the system using technologies in ways that the SBA has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?

No

5. How does the use of this technology affect public/employee privacy?

N/A

6. Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.

No

7. What kinds of information are collected as a function of the monitoring of individuals?

N/A

8. What controls will be used to prevent unauthorized monitoring?

ELend System Security Roles – Agency Security Access Procedures – Access is limited to those individuals with user IDs and passwords

9. Under which Privacy Act systems of records notice does the system operate? Provide number and name.

SBA Privacy Act System of Records –SBA 21

10. If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

N/A

F. ACCESS TO DATA:

1. Who will have access to the data in the system?

Contractors, users (Partners), managers, system administrators, developers

2. How is access to the data by a user determined?

Criteria – ELead System Security Roles and Procedures/Controls – Agency Security Access Procedures – Access is limited by control of User ID's, password controls, and the assignment of a Responsibility profile to all User ID's. Each Responsibility comes with a pre-determined set of privileges, limiting data that may be viewed to those screens and reports that are within the duties and needs of the user.

3. Will users have access to all data on the system or will the user's access be restricted? Explain.

Access is limited by control of User ID's, password controls, and the assignment of a Responsibility profile to all User ID's. Each Responsibility comes with a pre-determined set of privileges, limiting data that may be viewed to those screens and reports that are within the duties and needs of the user.

4. What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?

ELead System Security Roles – Agency Security Access Procedures – Access is limited by control of User ID's, password controls, and the assignment of a responsibility profile to all User ID's. Each Responsibility comes with a pre-determined set of privileges, limiting data that may be viewed to those screens and reports that are within the duties and needs of the user.

Education of Agency and contractor staff regarding the Privacy Act rules and prohibitions on the dissemination or use of non-public information is mandatory and ongoing. System audit trails can be used to document suspicious or irregular log-ons and navigation of the system. Agency network log-on procedures mandate a posted Privacy notice be viewed and acknowledged prior to entry. SBA Privacy Act System of Records SBA 21 defines routine uses of this information and serves as a control by defining acceptable uses. Limiting access to sensitive financial information to only those with a need to know remains the best and primary control.

5. Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system?

Yes, contract clauses are inserted in their contracts and other regulatory measures are addressed.

6. Do other systems share data or have access to the data in the system? If yes, explain.

Yes, Approved Loan Guarantees are uploaded to the SBA Mainframe for recording.

7. Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

Office of the Chief Financial Officer

8. Will other agencies share data or have access to the data in this system (Federal, State, Local, Other)?

No

9. How will the data be used by the other agency?

N/A

10. Who is responsible for assuring proper use of the data?

N/A